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Interim Counsel for the Consumer Class

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

MAXIMILIAN KLEIN, SARAH GRABERT,
and RACHEL BANKS KUPCHO, on behalf
of themselves and all others similarly situated,

Plaintiffs,

vs.

FACEBOOK, INC.,

Defendant.

This Document Relates To: All Actions

Consolidated Case No. 5:20-cv-08570-LHK

**DECLARATION OF NOAH S. HEINZ IN
SUPPORT OF PLAINTIFFS'
OPPOSITION TO FACEBOOK'S
MOTION TO DISQUALIFY KELLER
LENKNER LLC**

Hon. Lucy H. Koh
Date: September 30, 2021
Time: 1:30 p.m.
Courtroom: 8

1 I, Noah S. Heinz, declare as follows:

2 1. I am an Associate at Keller Lenkner LLC ("KL"). I have personal knowledge of the
3 facts stated herein, and, if called upon as a witness, I could and would competently testify thereto.

4 2. I have never spoken with Albert Pak about the substance of his prior work for
5 Facebook. He has never spoken with me about the substance of that work. I have never spoken
6 with Mr. Pak about the case KL has brought against Facebook. He has never spoken with me about
7 that case.

8
9 I declare that the foregoing is true and correct under penalty of perjury.

10 Executed May 21, 2021, in Arlington, VA.

11 /s/ Noah S. Heinz
12 Noah S. Heinz
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